September 30, 2016

Environmental Review Update Checklist Form
For Projects with Previously Approved Environmental Documents

The California Environmental Quality Act (CEQA) Guidelines Sections 15162 through 15164 set forth the criteria for determining the appropriate additional environmental documentation, if any, to be completed when there is a previously adopted Negative Declaration (ND) or a previously certified environmental impact report (EIR) covering the project for which a subsequent discretionary action is required. This Environmental Review Update Checklist Form has been prepared in accordance with CEQA Guidelines Section 15164(e) to explain the rationale for determining whether any additional environmental documentation is needed for the subject discretionary action.

1. Background on the previously certified EIR:

- A programmatic Environmental Impact Report (EIR) for the 1991 San Diego County Regional Air Quality Strategy (RAQS) was certified by the County of San Diego Air Pollution Control Board (Board) on June 30, 1992. The certified programmatic EIR analyzed the potential environmental impacts of the various control technologies for implementing the control measures proposed in the 1991 RAQS and found that any potential adverse environmental impacts would be mitigated below a level of significance.

- A Supplemental EIR addressing the 1998 RAQS Revision and supplementing the Final EIR for the 1991 RAQS was certified by the Board on June 17, 1998. This Supplemental EIR found that the proposed 1998 changes to the RAQS were not substantial and would not result in new or more severe significant environmental impacts.

- An Addendum to the previously certified Final Environmental Impact Report for the 1991 San Diego County Regional Air Quality Strategy was approved by the Board on August 8, 2001. This addendum found that the proposed 2001 RAQS Revision would not require major revisions to the previous EIR, result in any new significant adverse impacts, make previously identified significant adverse impacts more severe, or require new mitigation measures or alternatives.

- A Negative Declaration addressing the 2004 RAQS Revision was adopted by the Board on July 28, 2004. The Negative Declaration was based on a finding of no substantial evidence that the proposed 2004 RAQS Revision would have a significant adverse effect on the environment.

- An Addendum to the previously certified Final Environmental Impact Report for the 1991 San Diego County Regional Air Quality Strategy was approved by the Board on April 22, 2009. This addendum found that the proposed 2009 RAQS Revision would not require major revisions to the previous EIR, result in any new significant adverse impacts, make previously identified significant adverse impacts more severe, or require new mitigation measures or alternatives.

2. Lead agency name and address:

   San Diego County Air Pollution Control District
   10124 Old Grove Road
   San Diego, California 92131

3. a. Lead agency contact:

   Andy Hamilton
   Supervising Air Resources Specialist
   (858) 586-2641
   E-mail: Andy.Hamilton@sdcounty.ca.gov

   b. Project applicant's name and address:

   San Diego County Air Pollution Control District
   10124 Old Grove Road
   San Diego, California 92131

4. Summary of the project:

   San Diego County is a nonattainment area for California ambient air quality standards for ozone. Pursuant to the California Clean Air Act, air districts in nonattainment areas are required to prepare and implement air quality strategies identifying all feasible emission control measures to locally attain state ozone standards by the earliest practicable date. Accordingly, the Regional Air Quality Strategy (RAQS) for San Diego County was developed and adopted in 1992, identifying all feasible control measures to reduce emissions of ozone precursors (oxides of nitrogen (NOx) and volatile organic compounds (VOC)) from stationary emission sources under the authority of the San Diego County Air Pollution Control District (District).

   The California Clean Air Act also requires periodic RAQS revisions identifying the status of scheduled control measures and incorporating any new control measures determined feasible. Such evaluations are based on updated information regarding technology availability,

emission reduction potential, and cost-effectiveness. Accordingly, the RAQS was revised in 1995, 1998, 2001, 2004, and 2009.[1]

The proposed 2016 RAQS Revision ensures continued compliance with the all-feasible-measure requirement. It also provides more ozone precursor emission reductions compared to previous RAQS revisions, and reflects the District's tentative schedule of future regulatory activity. These possible control measures will be evaluated and, if warranted, developed into proposed rules for Board consideration in future years. The proposed 2016 RAQS Revision also provides an update on previously scheduled measures from the 2009 RAQS Revision, and outlines the District's incentive program to further emissions. Lastly, as required by state law, the document includes a reassessment and reaffirmation of the District's previous findings that state emission offset requirements are not necessary for San Diego County to achieve and maintain state ozone standards by the earliest practicable date. Discussion of each project element is included below.

Study Measures for Evaluation and/or Adoption

A. **Further Control of Stationary Reciprocating Internal Combustion Engines – BEST AVAILABLE RETROFIT CONTROL TECHNOLOGY (BARCT)**. Existing Rule 69.4.1, Stationary Reciprocating Internal Combustion Engines – BARCT, was adopted in 2000 and applies to both gas and liquid-fueled engines. Since adoption, other air districts including South Coast Air Quality Management District (SCAQMD) (Rules 1110), have tightened their emission limits and have also been more prescriptive in the equipment subject to regulation. If similar controls were adopted in San Diego County, annual emission reductions are estimated to be approximately 42 tons of NOx per year (0.12 tons per day) when fully implemented. Amendments may also be warranted to ensure the existing Rule is consistent with the federal New Source Performance Standard (NSPS) IIII and state Stationary Diesel Engine Air Toxic Control Measure. Preliminary cost-effectiveness is estimated to range between $1 and $4 per pound of NOx reduced. As such, the District has scheduled further evaluation of a proposed amendment to Rule 69.4.1, and if warranted, will consider adoption of the lower emission limits during the next three years.

B. **Further Control of New Water Heaters, Small Boilers, Process Heaters, and Steam Generators between 75,000 and 600,000 British Thermal Units per hour (BTU/hour)**. The District currently regulates water heaters and boilers of various sizes through multiple rules. However, large water heaters between 75,000 and 600,000 BTU/hour are currently not regulated in San Diego County. Several other California air districts regulate equipment in this size range, including SCAQMD Rule 1146.2 which limits NOx emissions for units between 75,000 and 2 million BTU/hour. At a previous public workshop discussing Rule 69.5.1, water heater manufacturers and distributors requested that District staff consider adopting control requirements matching those in

[1] Completion of federal plans in 2007 and 2012 addressing national ozone standards precluded RAQS revisions in these years. Pursuant to state law, all rule development activities addressing state ozone planning requirements continued in the interim.

SCAQMD for water heaters larger than 75,000 BTU/hour, to prevent uncontrolled units from being purchased in San Diego County and exported to the South Coast Air Basin. At the time, further controls for units in this size range were not cost-effective.

In 2016, the District preliminarily re-evaluated the feasibility of amending Rule 69.2.1 to reflect a lower limit of 20 parts per million by volume (ppmv) NOx for all new boilers and large water heaters between 75,000 and 2 million BTU/hour. Preliminary cost-effectiveness was estimated from $1 to $9 per pound of NOx reduced. Potential emission reductions from full implementation of the proposed measure are approximately 0.80 tons of NOx per day. Consequently, the District will further evaluate adoption of the lower emission limit, and if warranted, will schedule a potential amendment to Rule 69.2.1 during the next three years.

C. **Control of Emissions from Composting Operations (Non-Residential)**. Currently, the District does not specifically regulate emissions from composting operations. However, these operations emit VOC through decomposition of organic materials (such as green and wood waste, animal manure, and food waste) during chipping and grinding, stockpiling, and composting activities. Moreover, composting activities are expected to increase in the region in response to federal, state, and local mandates for waste diversion and waste reduction. Accordingly, the District will investigate the feasibility of a measure to control VOC emissions from these sources.

Other California air districts have adopted composting rules, including SCAQMD (Rule 1133, 1133.2, and Rule 1133.3) and San Joaquin Valley Air Pollution Control District (SJVAPCD) (Rule 4565 and 4566). These rules establish best management practices (BMPs) for chipping and grinding of green waste to produce materials for composting or other uses, and to better manage stockpile operations to reduce VOC emissions. Accordingly, the District will evaluate these rules to determine which standards, if any, are feasible for implementation in San Diego County.

Importantly, other public agencies within California (including the California Department of Resources Recycling and Recovery and solid waste local enforcement agencies) are engaged in or are considering regulating composting activities to address other environmental objectives, such as landfill diversion and water quality. This has resulted in a dynamic regulatory environment, which will require the District to closely coordinate with other agencies and affected composting facilities to ensure that a possible District rule to control VOC emissions would be feasible, and consistent with other regulatory requirements.

SCAQMD estimated a reduction of 328.5 tons of VOC per year (0.9 tons per day) from 17 composting facilities within the SCAQMD region. Preliminary estimates for annual emission reductions in San Diego County, if similar controls are found to be feasible, are at least 120 tons per year (0.3 tons per day), about a 40% reduction in VOC emissions for these facilities. Consequently, the District has scheduled further evaluation of the proposed measure, and if warranted, will consider adoption of a new rule during the next three years.

D. **Further Control of Marine Coatings.** District Rule 67.18 sets VOC limits for primers, coatings, topcoats, and sealers used in the coating of marine and fresh water vessels, oil drilling platforms, navigational aids, and structures intended for exposure to a marine environment. Limits vary depending on the material, but range between 275 and 700 grams of VOC per liter of coating, which generally aligns with other air districts' standards. The rule was last amended on May 15, 1996.

An assessment is necessary to determine whether lower VOC limits of marine coating materials could occur. Consideration will also be given to lowering the VOC limits of cleaning materials used in marine coating operations, which is currently set at 200 grams or less of VOC per liter of coating. Anticipated emission reductions from these minor amendments are expected to reduce emissions by 4 tons of VOC per year (0.01 tons per day), with cost-effectiveness to be determined at a later date. Consequently, the District has scheduled further evaluation of a proposed amendment to Rule 67.18, and if warranted, will consider adoption of the lower emission limits during the next three years.

E. **Further Control of Natural Gas-Fired Fan-Type Central Furnaces.** The District adopted Rule 69.6 on June 17, 1998. The rule established NOx emission limits of 40 ng/J for new residential furnaces. On September 5, 2014, SCAQMD amended their equivalent rule (Rule 1111) to further tighten the NOx emission limit for furnaces by 65%, to 14 ng/J. Because the tightened emission limit is technology forcing, complying units are not currently available. SCAQMD Rule 1111 also phases the requirement in over four years as manufacturers comply with the new emission limits. The District will monitor the forthcoming availability of complying units. When a sufficient number of compliant models are found to be available, the District will schedule further evaluation of a proposed amendment to Rule 69.6, and if warranted, will consider adoption of the lower emission limit during the next three years.

F. **Further Control of Aerospace Coating Operations**. Emissions in this source category have greatly declined in San Diego County since 1990 due to three factors: the implementation of District Rule 67.9, the decline in government funding for aerospace operations and, in particular, the closing of one large facility. Total VOC emissions from this source category are now estimated to be 30 tons per year.

SCAQMD Rule 1124 contains similar VOC limits in most coating categories. However, some categories contain lower limits, including adhesive bonding primers, antichafe coatings, dry lubricative materials (nonfastener), form release coatings, fuel tank coatings, paint strippers, and sealants. In San Diego County, VOC emissions from these coating materials that exceed the limits in Rule 1124 are estimated to be less than two tons per year. Emission reductions anticipated from adopting the Rule 1124 limits are estimated to be less than two tons per year (0.005 tons per day).

Despite limited potential emission reductions, the District has scheduled further evaluation of a proposed amendment to Rule 67.9 to refresh the rule and update emission limits as needed to meet federal requirements. If warranted, the District will consider adoption of the modifications during the next three years

G. **Medium Boilers, Process Heaters, and Steam Generators.** There are an estimated 500 boilers rated between 2-5 million BTU/hour in San Diego County, cumulatively emitting an estimated 200 tons per year of NOx. Possible NOx control requirements (similar to those in Rule 69.2.1) for boilers in this size range were evaluated in 2011-12 and determined infeasible due to poor cost-effectiveness.

Some air districts with worse air quality and more demanding requirements for emission reductions have implemented NOx regulatory controls on boilers in this size range. Control costs may have dropped over time as a result; therefore, the District will further evaluate the feasibility of a possible rule to control NOx emissions from such boilers in San Diego County during the next three years. This could include a possible requirement that boiler manufacturers certify new units as meeting a specified NOx emission limit (e.g., 30 parts per million by volume) or that operators of existing units obtain a District permit. Based on a preliminary evaluation, this measure could reduce NOx emissions upon full implementation by an estimated 89.5 tons per year (0.25 tons per day).

Deleted Measures

A. **High Emitting Spray Booth Facilities**. The 2009 RAQS Revision included a commitment to analyze emission reductions from high-emitting spray booth facilities in San Diego County. SCAQMD's comparable rule (Rule 1132) applies to spray booths emitting more than 20 tons of VOC per year. This rule requires a further 65% emission reduction of VOC from these operations beyond that required by other SCAQMD coating rules. The District currently has no comparable rule.

Recent District emission inventory data indicate there is one facility in San Diego County for which VOC emissions from one spray booth (or a combination of spray booths) exceed 20 tons per year. However, only 25% of the facility's VOC emissions are from coatings specifically applied in a spray booth. The remainder of emissions emanate from area sources, which are coatings applied to large vessels where no spray booth could reasonably accommodate their large size. The facility has voluntarily installed controls on all seven spray booths with a control efficiency of 95%. Additionally, the coatings being applied are controlled through other existing state and local measures.

Since controls are already installed on all facilities, there are no additional emission reductions that could be obtained by adopting a similar measure in San Diego County. As such, no further evaluation of this source category is necessary at this time, and the measure has been removed from the RAQS.

B. **Equipment Leaks**. This source category is regulated by Bay Area Air Quality Management District (BAAQMD) Rule 8-18, which establishes vapor and liquid leak standards to reduce VOC emissions from leaking equipment at refineries, bulk terminals, bulk plants and chemical plants. The 2009 RAQS Revision identified this rule as a low priority item in San Diego County due to the limited emission reduction potential for adopting a new rule.

Rule 8-18 exempts many facilities, however connections between loading racks at bulk terminals and bulk plants and the vehicle (mobile transports) being loaded are regulated. The rule sets inspection frequency criteria (daily visual, quarterly instrument checks for most components), repair requirements, and leak standards – three drops per minute for liquid leaks, 100 ppmv as methane for most vapor leaks, and 500 ppmv as methane for pumps, compressors and pressure relief devices.

The most recent inventory of these sources showed approximately 12 tons per year of total VOC emissions from loading rack operations. Fugitive vapor and liquid leak emissions emanating from hard-piped components, pumps and compressors comprise only seven tons of VOC per year. Furthermore, fugitive vapor emissions from operations subject to other District rules have drastically declined since 2013 because of plant process changes and refined calculation methods. It is anticipated that requiring additional requirements to control leaks from these facilities would not be cost-effective because of the low emission reduction potential. Accordingly, the District does not plan any further evaluation of this source category at this time, and the measure has been removed from the RAQS.

C. **Indirect Source Rule**. The 2009 RAQS Revision included a commitment to analyze the feasibility of adopting an Indirect Source Rule (addressing vehicle trips, and associated emissions attributed to new land developments). Other air districts, including SJVAPCD and Imperial County Air Pollution Control District, have adopted similar rules. These districts have differing approaches to their indirect source control requirements; therefore an evaluation of these rules was necessary to better understand their requirements and applicability in San Diego County. In addition, the analysis would determine whether a local Indirect Source Rule would provide significant emission reductions beyond that achieved by the District's existing voluntary Indirect Source Program.

The District determined that an Indirect Source Rule is not feasible for the San Diego region because associated emission reductions would not be substantial beyond current efforts to reduce VMT. Specifically, in 2015, the San Diego Association of Governments (SANDAG) on behalf of its 19 affiliated local jurisdictions adopted a Regional Transportation Plan (RTP)/Sustainable Community Strategy (SCS) that projects far greater reliance on walking, bicycling, and transit to meet future travel needs. By federal law, the RTP must be based on local general plans. Since the early 2000's, most of the region's jurisdictions have adopted land use strategies that reduce future low-density development in open space areas, in favor of higher-density developments in areas with existing infrastructure, residents, and services.

In addition to changes in the emphasis of regional planning for transportation, state laws and the state's CEQA guidance have been evolving significantly in recent years. These include CEQA Guidance modifications in 2009 by the Office of Planning and Research (OPR) to recommend parking supply not be included in CEQA reviews of new development, and placed greater emphasis on safety of bicycling and walking. In addition, the legislature adopted laws reducing CEQA review requirements for bicycle facilities and local bicycle master plans. Most significantly, Senate Bill (SB) 743 (2013) directed OPR to revise the guidelines to eliminate categorization of traffic congestion as

an environmental impact, and to recommend alternative transportation metrics emphasizing bicycling, walking, transit, and greater diversity of land uses (which promotes alternatives to driving). In January 2016, OPR issued draft amendments to the CEQA guidance that effectively changes the state's required traffic metric from Level of Service (traffic flow) to Vehicle Miles Travelled (total driving). This change will incentivize developers and cities to minimize driving in the same way that adopted Indirect Source Rules do, but will operate statewide and affect a greater variety of project types.

Adoption of new planning goals or transportation metrics does not by itself ensure that all development or infrastructure projects will minimize indirect source emissions to the same extent an Indirect Source Rule might have. It is possible, for example, that jurisdictions or Metropolitan Planning Organizations (MPO's) will approve projects that are exceptions to their adopted plans. However, based on past planning trends, exceptions are most likely to be relatively rare.

For the foregoing reasons, the District does not consider an Indirect Source Rule to provide additional emission reductions, and would in fact be duplicative to planning efforts already operating on a larger scale and addressing a greater variety of potential sources. Accordingly, the District does not plan any further evaluation of this source category at this time, and the measure has been removed from the RAQS.

Incentive Programs

The proposed 2016 RAQS Revision includes a summary of existing financial incentive programs for reducing mobile source emissions in San Diego County. Financial incentive programs augment traditional regulatory programs to further encourage technology development and provide cost-effective emission reductions not easily achieved by regulations. Local projects funded during the 2007-2015 period provided combined VOC and NOx emission reductions of approximately 2.5 tons per day (926 tons per year), as well as 0.4 tons per day (157 tons per year) of carbon monoxide (CO) reductions and 0.09 tons per day (32 tons per year) of particulate matter (PM) reductions.

No actions affecting ongoing incentive programs are included in the proposed 2016 RAQS Revision. These programs will continue to be implemented regardless of whether the 2016 RAQS Revision is adopted. Consequently, incentive programs are not further considered in this 2016 Addendum.

State Offset Exemption

In 1998, the District amended its New Source Review (NSR) Rules 20.1-20.4 to repeal state emission offset requirements, as authorized by state law (California Health and Safety Code §40918.5 et. seq.). The proposed 2016 RAQS Revision includes a detailed reassessment and reaffirmation of the District's previous findings that emission reductions from unbanked shutdowns compensate for permitted emission increases from sources that may have triggered

state offset requirements. Furthermore, the repeal of state offset requirements has not significantly impacted the projected trend of decreasing total ozone-precursor emissions in San Diego County, nor is it anticipated to in the future. Consequently, state emission offset requirements are not necessary for the county to achieve and maintain the state ozone standard by the earliest practicable date. State law requires this reassessment and results do not warrant any proposed amendments of NSR rules. Consequently, the reassessment is not further considered in this 2016 Addendum.

5. DOES THE PROJECT FOR WHICH A SUBSEQUENT DISCRETIONARY ACTION IS NOW PROPOSED DIFFER IN ANY WAY FROM THE PREVIOUSLY APPROVED PROJECT?

YES	NO
☒	☐

This discretionary action differs from the previously approved project because the project proposes to:

- Evaluate more stringent emissions limits using similar control technologies for the same control measures as analyzed in the previous programmatic EIR;
- Consider adoption of the revised control measures on an updated adoption schedule;
- Consider adoption of possible new control measures regulating emissions from composting operations (non-residential).

6. **SUBJECT AREAS DETERMINED TO HAVE NEW OR SUBSTANTIALLY MORE SEVERE SIGNIFICANT ENVIRONMENTAL EFFECTS COMPARED TO THOSE IDENTIFIED IN THE PREVIOUS ND OR EIR**. The subject areas checked below were determined to be new significant environmental effects or to be previously identified effects that have a substantial increase in severity either due to a change in project, change in circumstances or new information of substantial importance, as indicated by the checklist and discussion on the following pages.

☑ NONE		
☐ Aesthetics	☐ Agriculture & Forest Resources	☐ Air Quality
☐ Biological Resources	☐ Cultural Resources	☐ Geology/Soils
☐ Greenhouse Gas Emissions	☐ Hazards & Haz. Materials	☐ Hydrology/Water Quality
☐ Land Use/Planning	☐ Mineral Resources	☐ Noise
☐ Population/Housing	☐ Public Services	☐ Recreation
☐ Transportation/Traffic	☐ Utilities/Service Systems	☐ Mandatory Findings of Significance

DETERMINATION:
On the basis of this analysis, the San Diego County Air Pollution Control District has determined that:

☑	No substantial changes are proposed in the project and there are no substantial changes in the circumstances under which the project will be undertaken that will require major revisions to the previous EIR due to the involvement of significant new environmental effects or a substantial increase in the severity of previously identified significant effects. Also, there is no "new information of substantial importance" as that term is used in CEQA Guidelines Section 15162(a)(3). Therefore, the previously certified EIR is adequate upon completion of an ADDENDUM.
☐	Substantial changes are proposed in the project or there are substantial changes in the circumstances under which the project will be undertaken that will require major revisions to the previous ND due to the involvement of significant new environmental effects or a substantial increase in the severity of previously identified significant effects. Or, there is "new information of substantial importance," as that term is used in CEQA Guidelines Section 15162(a)(3). However all new significant environmental effects or a substantial increase in severity of previously identified significant effects are clearly avoidable through the incorporation of mitigation measures agreed to by the project applicant. Therefore, a SUBSEQUENT ND is required.
☐	Substantial changes are proposed in the project or there are substantial changes in the circumstances under which the project will be undertaken that will require major revisions to the previous ND or EIR due to the involvement of significant new environmental effects or a substantial increase in the severity of previously identified significant effects. Or, there is "new information of substantial importance," as that term is used in CEQA Guidelines Section 15162(a)(3). Therefore, a SUBSEQUENT or SUPPLEMENTAL EIR is required.

Signature	Date
Andy Hamilton	Supervising Air Resources Specialist
Printed Name	Title

INTRODUCTION

CEQA Guidelines Sections 15162 through 15164 set forth the criteria for determining the appropriate additional environmental documentation, if any, to be completed when there is a previously adopted ND or a previously certified EIR for the project.

CEQA Guidelines, Section 15162(a) and 15163 state that when an ND has been adopted or an EIR certified for a project, no Subsequent or Supplemental EIR or Subsequent Negative Declaration shall be prepared for that project unless the lead agency determines, on the basis of substantial evidence in light of the whole public record, one or more of the following:

1. Substantial changes are proposed in the project which will require major revisions of the previous EIR or Negative Declaration due to the involvement of new significant environmental effects or a substantial increase in the severity of previously identified significant effects.

2. Substantial changes occur with respect to the circumstances under which the project is undertaken which will require major revisions of the previous EIR or Negative Declaration due to the involvement of new significant environmental effects or a substantial increase in the severity of previously identified significant effects.

3. New information of substantial importance, which was not known and could not have been known with the exercise of reasonable diligence at the time the previous EIR was certified as complete or the Negative Declaration was adopted, shows any of the following:

    a. The project will have one or more significant effects not discussed in the previous EIR or Negative Declaration; or

    b. Significant effects previously examined will be substantially more severe than shown in the previously adopted Negative Declaration or previously certified EIR; or

    c. Mitigation measures or alternatives previously found not to be feasible would in fact be feasible, and would substantially reduce one or more significant effects of the project, but the project proponents decline to adopt the mitigation measure or alternative; or

    d. Mitigation measures or alternatives which are considerably different from those analyzed in the previous Negative Declaration or EIR would substantially reduce one or more significant effects on the environment, but the project proponents decline to adopt the mitigation measure or alternative.

CEQA Guidelines, Section 15164(a) states that an Addendum to a previously certified EIR may be prepared if some changes or additions are necessary but none of the conditions described in Section 15162 calling for preparation of a Subsequent or Supplemental EIR have occurred.

CEQA Guidelines, Section 15164(b) states that an Addendum to a previously adopted Negative Declaration may be prepared if only minor technical changes or additions are necessary.

If the factors listed in CEQA Guidelines Sections 15162, 15163, or 15164 have not occurred or are not met, no changes to the previously certified EIR or previously adopted ND are necessary.

The following responses detail any changes in the project, changes in circumstances under which the project is undertaken and/or "new information of substantial importance" that may cause one or more effects to environmental resources. The responses support the "Determination," above, as to the type of environmental documentation required, if any.

ENVIRONMENTAL REVIEW UPDATE CHECKLIST

I. AESTHETICS – Since the previous EIR was certified, are there any changes in the project, changes in circumstances under which the project is undertaken and/or "new information of substantial importance" that cause one or more effects to aesthetic resources including: scenic vistas; scenic resources including, but not limited to, trees, rock outcroppings, or historic buildings within a state scenic highway; existing visual character or quality of the site and its surroundings; or day or nighttime views in the area?

Potentially Significant Impact	Less Than Significant with Mitigation Incorporated	Less Than Significant Impact	No Impact
☐	☐	☒	☐

No significant impacts to aesthetics were anticipated by the previous EIR. It was acknowledged that some emission control equipment can be architecturally unappealing, but it would typically be installed at existing industrial sites where visual impacts would be insignificant. No new impacts would be expected from adoption of the potential new or amended control measures. These measures will be analyzed individually for environmental impacts if and when they are proposed for adoption. There are no changes in the project, changes in circumstance, or new information of substantial importance that involve significant new environmental effects or a substantial increase in the severity of previously identified environmental effects.

II. AGRICULTURE & FOREST RESOURCES – Since the previous EIR was certified, are there any changes in the project, changes in circumstances under which the project is undertaken and/or "new information of substantial importance" that cause one or more effects to agriculture or forestry resources including: conversion of Prime Farmland, Unique Farmland, or Farmland of Statewide Importance to a non-agricultural use and/or conflicts with existing zoning for agricultural use or Williamson Act contract, result in the loss of forest land or conversion of forest land to non-forest use, conflict with existing zoning for, or cause rezoning of, forest land (as defined by Public Resources Code section 12220(g), timberland (as defined by Public resources Code section 4526), or timberland zoned Timberland Production [as defined by Government Code section 51104(g)], or involve other changes in the existing environment which, due to their location or nature, could result in conversion of farmland to non-agricultural use or conversion of forest land to non-forest use?

Potentially Significant Impact	Less Than Significant with Mitigation Incorporated	Less Than Significant Impact	No Impact
☐	☐	☒	☐

Potential impacts to agriculture and forestry resources from RAQS implementation were analyzed in the previous environmental document. No significant impacts to agricultural resources were identified. No new impacts would be expected from adoption of the potential new or amended control measures. These measures will be analyzed individually for environmental impacts if and when they are proposed for adoption. There are no changes in the project, changes in circumstance, or new information of substantial importance that involve significant new environmental effects or a substantial increase in the severity of previously identified environmental effects.

III. AIR QUALITY – Since the previous EIR was certified, are there any changes in the project, changes in circumstances under which the project is undertaken and/or "new information of substantial importance" that cause one or more effects to air quality including: conflicts with or obstruction of implementation of the San Diego County Regional Air Quality Strategy (RAQS) or applicable portions of the State Implementation Plan (SIP); violation of any air quality standard or substantial contribution to an existing or projected air quality violation; a cumulatively considerable net increase of any criteria pollutant for which the project region is non-attainment under an applicable federal or state ambient air quality standard (including releasing emissions which exceed quantitative thresholds for ozone precursors); exposure of sensitive receptors to substantial pollutant concentrations; or creation of objectionable odors affecting a substantial number of people?

Potentially Significant Impact	Less Than Significant with Mitigation Incorporated	Less Than Significant Impact	No Impact
☐	☐	☐	☒

Net Ozone Air Quality Benefit - The previous EIR identified no significant unmitigable impacts to air quality from adoption of the RAQS. In fact, it showed that air quality would improve with implementation of the RAQS. Air quality has continued to improve since the initial RAQS adoption. State one-hour ozone standard exceedances declined nearly 98%, going from 168 in 1977, to just three in 2015. Additionally, 172 exceedances of the state eight-hour standard in 1977 dropped to 36 exceedances in 2015, a nearly 79% improvement. Pursuant to state law, a RAQS revision must at least as effective in improving air quality as the previous RAQS version. Indeed, the proposed 2016 RAQS Revision provides considerable additional ozone precursor emission reductions, thereby satisfying this requirement.

Three VOC control measures and four NOx control measures have been tentatively scheduled for further evaluation during the next three years for feasibility and rule adoption, if warranted. Based on a preliminary evaluation, these seven measures would collectively reduce VOC emissions by 0.3 tons per day, and NOx emissions by approximately 1.2 tons per day. Consequently, the proposed RAQS Revision will provide additional emission reductions relative to the previous RAQS Revision, and therefore is more effective in improving regional air quality. Additionally, some VOC are toxic air contaminants and can cause odors. Therefore, additional VOC reductions contemplated in the proposed 2016 RAQS Revision could also result in reduced human exposure to toxic air contaminants and odors.

There are no changes in the project, changes in circumstance, or new information of substantial importance that involve significant new environmental effects or a substantial increase in the severity of previously identified environmental effects.

IV. BIOLOGICAL RESOURCES – Since the previous EIR was certified, are there any changes in the project, changes in circumstances under which the project is undertaken and/or "new information of substantial importance" that cause one or more effects to biological resources including: adverse effects on any sensitive natural community (including riparian habitat) or species identified as a candidate, sensitive, or special status species in a local or regional plan, policy, or regulation, or by the California Department of Fish and Game or U.S. Fish and Wildlife Service; adverse effects to federally protected wetlands as defined by Section 404 of the Clean Water Act; interference with the movement of any native resident or migratory fish or wildlife species or with wildlife corridors, or impeding the use of native wildlife nursery sites; and/or conflicts with the provisions of any adopted

Habitat Conservation Plan, Natural Communities Conservation Plan, or other approved local, regional or state habitat conservation plan, policies or ordinances?

Potentially Significant Impact	Less Than Significant with Mitigation Incorporated	Less Than Significant Impact	No Impact
☐	☐	☒	☐

No significant impacts to biological resources were anticipated by the previous EIR. Potential impacts identified from construction of alternative transportation facilities would be mitigated to a level of less than significant. The proposed 2016 RAQS Revision does not contemplate the construction of additional alternative transportation facilities. Additionally, possible impacts were also identified for an unlikely accidental release from selective catalytic reduction (SCR) NOx emission control systems, but the proposed 2016 RAQS Revision does not include any additional or different SCR requirements. No new impacts would be expected from adoption of the potential new or amended control measures. These measures will be analyzed individually for environmental impacts if and when they are proposed for adoption. There are no changes in the project, changes in circumstance, or new information of substantial importance that involve significant new environmental effects or a substantial increase in the severity of previously identified environmental effects.

V. CULTURAL RESOURCES – Since the previous EIR was certified, are there any changes in the project, changes in circumstances under which the project is undertaken and/or "new information of substantial importance" that cause one or more effects to cultural resources including: causing a change in the significance of a historical or archaeological resource as defined in State CEQA Guidelines Section 15064.5; destroying a unique paleontological resource or site or unique geologic feature; and/or disturbing any human remains, including those interred outside of formal cemeteries?

Potentially Significant Impact	Less Than Significant with Mitigation Incorporated	Less Than Significant Impact	No Impact
☐	☐	☐	☒

No impacts to cultural resources were anticipated by the previous EIR. No new impacts would be expected from adoption of the potential new or amended control measures. These measures will be analyzed individually for environmental impacts if and when they are proposed for adoption. There are no changes in the project, changes in circumstance, or new information of substantial importance that involve significant new environmental effects or a substantial increase in the severity of previously identified environmental effects.

VI. GEOLOGY AND SOILS – Since the previous EIR was certified, are there any changes in the project, changes in circumstances under which the project is undertaken and/or "new information of substantial importance" that result in one or more effects from geology and soils including: exposure of people or structures to potential substantial adverse effects, including the risk of loss, injury, or death involving rupture of a known earthquake fault, seismic-related ground failure, including liquefaction, strong seismic ground shaking, or landslides; result in substantial soil erosion or the loss of topsoil; produce unstable geological conditions that will result in adverse impacts resulting from landslides, lateral spreading, subsidence, liquefaction or collapse; being located on expansive soil creating substantial risks to life or property; and/or having soils incapable of adequately supporting

the use of septic tanks or alternative wastewater disposal systems where sewers are not available for the disposal of wastewater?

Potentially Significant Impact	Less Than Significant with Mitigation Incorporated	Less Than Significant Impact	No Impact
☐	☐	☐	☒

No impacts to geology and soils were anticipated by the previous EIR. No new impacts would be expected from adoption of the potential new or amended control measures. These measures will be analyzed individually for environmental impacts if and when they are proposed for adoption. There are no changes in the project, changes in circumstance, or new information of substantial importance that involve significant new environmental effects or a substantial increase in the severity of previously identified environmental effects.

VII. GREENHOUSE GAS (GHG) EMISSIONS – Since the previous EIR was certified, are there any changes in the project, changes in circumstances under which the project is undertaken and/or "new information of substantial importance" that result in one or more effects related to environmental effects associated with greenhouse gas emissions or compliance with applicable plans, policies or regulations adopted for the purpose of reducing greenhouse gas emissions?

Potentially Significant Impact	Less Than Significant with Mitigation Incorporated	Less Than Significant Impact	No Impact
☐	☐	☒	☐

Net GHG Emissions Benefit – Gases that trap heat in the atmosphere are often called greenhouse gases (GHGs), comparable to a greenhouse, which captures and traps radiant energy. The State CEQA Guidelines were amended in March 2010 to require that potential environmental effects of greenhouse gas emissions be addressed in CEQA documents. GHGs are emitted by natural processes and human activities. The six major GHGs are carbon dioxide (CO2), methane (CH4), nitrous oxide (N2O), sulfur hexafluoride (SF6), hydrofluorocarbons (HFCs), and perfluorocarbon (PFCs). Scientific consensus, as reflected in recent reports issued by the United Nations Intergovernmental Panel on Climate Change, is that the majority of the observed climate change over the last 50 years can be attributable to increased concentration of GHGs in the atmosphere due to human activities, particularly increased combustion of fossil fuels.

Further increases in GHG emissions are expected to contribute to cause additional climate change, which may results in more droughts, more frequent and extreme heat waves, erratic storm and flood events, decreases in winter snowpack, a rise in sea level, increases in water temperatures, an increase in coastal erosion, intrusion of sea water, an increase in the duration of wildfire season, and increased occurrences of unhealthy ozone levels. Consequently, efforts are now underway at local, state, federal, and international levels to control GHG emission increases from human activities.

Implementation of the proposed 2016 RAQS Revision is likely to reduce GHG emissions and, therefore, will not locally contribute to climate change. The proposed future control measures to be evaluated during the next three years stand to reduce VOC and NOx emissions, which indirectly affect GHG pollutant levels. The proposed measures are not likely to increase GHG pollutants such as CO2, CH4, N2O, SF6, HFCs and PFCs. Instead, many of these proposed measures will likely provide GHG emission reduction co-benefits that result in better air-fuel controls. These controls will increase

thermal efficiency and reduce fuel combustion and associated GHG emissions.

No new impacts would be expected from adoption of the potential new or amended control measures. These measures will be analyzed individually for environmental impacts if and when they are proposed for adoption. There are no changes in the project, changes in circumstance, or new information of substantial importance that involve significant new environmental effects or a substantial increase in the severity of previously identified environmental effects.

VIII. HAZARDS AND HAZARDOUS MATERIALS – Since the previous EIR was certified, are there any changes in the project, changes in circumstances under which the project is undertaken and/or "new information of substantial importance" that result in one or more effects from hazards and hazardous materials including: creation of a significant hazard to the public or the environment through the routine transport, storage, use, or disposal of hazardous materials or wastes; creation of a significant hazard to the public or the environment through reasonably foreseeable upset and accident conditions involving the release of hazardous materials into the environment; production of hazardous emissions or handling hazardous or acutely hazardous materials, substances, or waste within one-quarter mile of an existing or proposed school; location on a site which is included on a list of hazardous materials sites compiled pursuant to Government Code Section 65962.5 creating a hazard to the public or the environment; location within an airport land use plan or, where such a plan has not been adopted, within two miles of a public airport or public use airport; within the vicinity of a private airstrip resulting in a safety hazard for people residing or working in the project area; impair implementation of or physically interfere with an adopted emergency response plan or emergency evacuation plan; and/or exposure of people or structures to a significant risk of loss, injury or death involving wildland fires, including where wildlands are adjacent to urbanized areas or where residences are intermixed with wildlands?

Potentially Significant Impact	Less Than Significant with Mitigation Incorporated	Less Than Significant Impact	No Impact
☐	☐	☒	☐

No significant impacts to hazards and hazardous materials were anticipated by the previous EIR. Possible impacts were identified for an unlikely accidental release from SCR NOx emission control systems. The previous EIR identified mitigation that sources must comply with existing regulations concerning handling and disposal of hazardous materials. However, that issue does not apply to this project because the proposed 2016 RAQS Revision does not propose any additional or different SCR requirements. No new impacts would be expected from adoption of the potential new or amended control measures. These measures will be analyzed individually for environmental impacts if and when they are proposed for adoption. There are no changes in the project, changes in circumstance, or new information of substantial importance that involve significant new environmental effects or a substantial increase in the severity of previously identified environmental effects.

IX. HYDROLOGY AND WATER QUALITY – Since the previous EIR was certified, are there any changes in the project, changes in circumstances under which the project is undertaken and/or "new information of substantial importance" that cause one or more effects to hydrology and water quality including: violation of any waste discharge requirements; an increase in any listed pollutant to an impaired water body listed under section 303(d) of the Clean Water Act ; cause or contribute to an exceedance of applicable surface or groundwater receiving water quality objectives or degradation

of beneficial uses; substantially deplete groundwater supplies or interfere substantially with groundwater recharge such that there would be a net deficit in aquifer volume or a lowering of the local groundwater table level; substantially alter the existing drainage pattern of the site or area in a manner which would result in substantial erosion, siltation or flooding on- or off-site; create or contribute runoff water which would exceed the capacity of existing or planned storm water drainage systems; provide substantial additional sources of polluted runoff; place housing or other structures which would impede or redirect flood flows within a 100-year flood hazard area as mapped on a federal Flood Hazard Boundary or Flood Insurance Rate Map or other flood hazard delineation map, including County Floodplain Maps; expose people or structures to a significant risk of loss, injury or death involving flooding, including flooding as a result of the failure of a levee or dam; and/or inundation by seiche, tsunami, or mudflow?

Potentially Significant Impact	Less Than Significant with Mitigation Incorporated	Less Than Significant Impact	No Impact
☐	☐	☒	☐

No significant impacts to hydrology and water quality were anticipated by the previous EIR. Possible impacts were identified for an unlikely accidental release of toxic substances from emission control systems. The previous EIR identified mitigation that sources must comply with existing regulations concerning wastewater treatment and hazardous materials disposal. Therefore, the potential impacts were considered less than significant. No new impacts would be expected from adoption of the potential new or amended control measures. These measures will be analyzed individually for environmental impacts if and when they are proposed for adoption. There are no changes in the project, changes in circumstance, or new information of substantial importance that involve significant new environmental effects or a substantial increase in the severity of previously identified environmental effects.

X. LAND USE AND PLANNING – Since the previous EIR was certified, are there any changes in the project, changes in circumstances under which the project is undertaken and/or "new information of substantial importance" that cause one or more effects to land use and planning including: physically dividing an established community; and/or conflicts with any applicable land use or habitat conversation plan, policy, or regulation of an agency with jurisdiction over the project adopted for the purpose of avoiding or mitigating an environmental effect?

Potentially Significant Impact	Less Than Significant with Mitigation Incorporated	Less Than Significant Impact	No Impact
☐	☐	☒	☐

No significant impacts to land use and planning were anticipated by the previous EIR. Potential land use impacts identified for transportation control measures would be reduced to insignificance by incorporating the transportation measures into the planning processes for general plans and zoning codes. No new impacts would be expected from adoption of the potential new or amended control measures. These measures will be analyzed individually for environmental impacts if and when they are proposed for adoption. There are no changes in the project, changes in circumstance, or new information of substantial importance that involve significant new environmental effects or a substantial increase in the severity of previously identified environmental effects.

XI. MINERAL RESOURCES – Since the previous EIR was certified, are there any changes in the project, changes in circumstances under which the project is undertaken and/or "new information of substantial importance" that cause one or more effects to mineral resources including: the loss of availability of a known mineral resource that would be of value to the region and the residents of the state; and/or loss of locally-important mineral resource recovery site delineated on a local general plan, specific plan or other land use plan?

Potentially Significant Impact	Less Than Significant with Mitigation Incorporated	Less Than Significant Impact	No Impact
☐	☐	☐	☒

No impacts to mineral resources were anticipated by the previous EIR. No new impacts would be expected from adoption of the potential new or amended control measures. These measures will be analyzed individually for environmental impacts if and when they are proposed for adoption. There are no changes in the project, changes in circumstance, or new information of substantial importance that involve significant new environmental effects or a substantial increase in the severity of previously identified environmental effects.

XII. NOISE – Since the previous EIR was certified, are there any changes in the project, changes in circumstances under which the project is undertaken and/or "new information of substantial importance" that result in one or more effects from noise including: exposure of persons to or generation of noise levels in excess of standards established in the local general plan or noise ordinance, or applicable standards of other agencies; exposure of persons to or generation of excessive groundborne vibration or groundborne noise levels; a substantial permanent increase in ambient noise levels in the project vicinity above levels existing without the project; a substantial temporary or periodic increase in ambient noise levels in the project vicinity above levels existing without the project; for projects located within an airport land use plan or, where such a plan has not been adopted, within two miles of a public airport or public use airport, or for projects within the vicinity of a private airstrip, would the project expose people residing or working in the project area to excessive noise levels?

Potentially Significant Impact	Less Than Significant with Mitigation Incorporated	Less Than Significant Impact	No Impact
☐	☐	☒	☐

No significant impacts to noise were anticipated by the previous EIR. Compliance with existing noise ordinances will mitigate the potential impact of noise from emission control equipment to a level of less than significant. No new impacts would be expected from adoption of the potential new or amended control measures. These measures will be analyzed individually for environmental impacts if and when they are proposed for adoption. There are no changes in the project, changes in circumstance, or new information of substantial importance that involve significant new environmental effects or a substantial increase in the severity of previously identified environmental effects.

XIII. POPULATION AND HOUSING – Since the previous EIR was certified, are there any changes in the project, changes in circumstances under which the project is undertaken and/or "new information of substantial importance" that result in one or more effects to population and housing including: inducing substantial population growth in an area, either directly or indirectly; or

displacing substantial numbers of existing housing or people, necessitating the construction of replacement housing elsewhere?

Potentially Significant Impact	Less Than Significant with Mitigation Incorporated	Less Than Significant Impact	No Impact
☐	☐	☒	☐

No significant impacts to population and housing were anticipated by the previous EIR. Identified potential impacts of transportation control measures on population and housing were too speculative to be considered significant. No new impacts would be expected from adoption of the potential new or amended control measures. These measures will be analyzed individually for environmental impacts if and when they are proposed for adoption. There are no changes in the project, changes in circumstance, or new information of substantial importance that involve significant new environmental effects or a substantial increase in the severity of previously identified environmental effects.

XIV. PUBLIC SERVICES – Since the previous EIR was certified, are there any changes in the project, changes in circumstances under which the project is undertaken and/or "new information of substantial importance" that result in one or more substantial adverse physical impacts associated with the provision of new or physically altered governmental facilities or the need for new or physically altered governmental facilities, the construction of which could cause significant environmental impacts, in order to maintain acceptable service ratios, response times or other performance objectives for any of the following public services: fire protection, police protection, schools, parks, or other public facilities?

Potentially Significant Impact	Less Than Significant with Mitigation Incorporated	Less Than Significant Impact	No Impact
☐	☐	☒	☐

No significant impacts to public services were anticipated by the previous EIR. Possible impacts were identified for an unlikely accidental release of toxic substances from emission control systems. The previous EIR identified mitigation that sources must comply with existing regulations concerning wastewater treatment and hazardous materials disposal. Therefore, the potential impacts were considered less than significant. No new impacts would be expected from adoption of the potential new or amended control measures. These measures will be analyzed individually for environmental impacts if and when they are proposed for adoption. There are no changes in the project, changes in circumstance, or new information of substantial importance that involve significant new environmental effects or a substantial increase in the severity of previously identified environmental effects.

XV. RECREATION – Since the previous EIR was certified, are there any changes in the project, changes in circumstances under which the project is undertaken and/or "new information of substantial importance" that result in an increase in the use of existing neighborhood and regional parks or other recreational facilities such that substantial physical deterioration of the facility would occur or be accelerated; or that include recreational facilities or require the construction or expansion of recreational facilities which might have an adverse physical effect on the environment?

Potentially Significant Impact	Less Than Significant with Mitigation Incorporated	Less Than Significant Impact	No Impact
☐	☐	☒	☐

No significant impacts to recreation were anticipated by the previous EIR. Possible impacts were identified for an unlikely accidental release from SCR NOx emission control systems. The previous EIR identified mitigation that sources must comply with existing regulations concerning handling of hazardous materials. However, that issue does not apply to this project because the proposed 2016 RAQS Revision does not propose any additional or different SCR requirements. No new impacts would be expected from adoption of the potential new or amended control measures. These measures will be analyzed individually for environmental impacts if and when they are proposed for adoption. There are no changes in the project, changes in circumstance, or new information of substantial importance that involve significant new environmental effects or a substantial increase in the severity of previously identified environmental effects.

XVI. TRANSPORTATION/TRAFFIC – Since the previous EIR was certified, are there any changes in the project, changes in circumstances under which the project is undertaken and/or "new information of substantial importance" that cause effects to transportation/traffic including: conflicts with an applicable plan, ordinance, or policy establishing measures of effectiveness for the performance of the circulation system, taking into account all modes of transportation including mass transit and non-motorized travel and relevant components of the circulation system (e.g. intersections, streets, highways and freeways, pedestrian and bicycle paths, mass transit, etc.); exceedance, either individually or cumulatively, of a level of service standard established by the county congestion management agency for designated roads or highways; a change in air traffic patterns, including either an increase in traffic levels or a change in location that result in substantial safety risks; substantial increase in hazards due to a design feature (e.g., sharp curves or dangerous intersections) or incompatible uses (e.g., farm equipment); inadequate emergency access; and/or a conflict with adopted policies, plans, or programs supporting alternative transportation (e.g., bus turnouts, bicycle racks)?

Potentially Significant Impact	Less Than Significant with Mitigation Incorporated	Less Than Significant Impact	No Impact
☐	☐	☐	☒

No impacts to transportation/traffic were anticipated by the previous EIR. No new impacts would be expected from adoption of the potential new or amended control measures. These measures will be analyzed individually for environmental impacts if and when they are proposed for adoption. There are no changes in the project, changes in circumstance, or new information of substantial importance that involve significant new environmental effects or a substantial increase in the severity of previously identified environmental effects.

XVII. UTILITIES AND SERVICE SYSTEMS -- Since the previous EIR was certified, are there any changes in the project, changes in circumstances under which the project is undertaken and/or "new information of substantial importance" that cause effects to utilities and service systems including: exceedance of wastewater treatment requirements of the applicable Regional Water Quality Control Board; require or result in the construction of new water or wastewater treatment facilities, new storm water drainage facilities or expansion of existing facilities, the construction of which could cause significant environmental effects; require new or expanded entitlements to water supplies or new water resources to serve the project; result in a determination by the wastewater treatment provider, which serves or may serve the project that it has adequate capacity to serve the project's projected demand in addition to the provider's existing commitments; be served by a landfill with sufficient permitted capacity to accommodate the project's solid waste disposal needs; and/or noncompliance with federal, state, and local statutes and regulations related to solid waste?

Potentially Significant Impact	Less Than Significant with Mitigation Incorporated	Less Than Significant Impact	No Impact
☐	☐	☒	☐

No significant impacts to utilities and service systems were anticipated by the previous EIR. Possible impacts were identified for an unlikely accidental release of toxic substances from emission control systems. The previous EIR identified mitigation that sources must comply with existing regulations concerning wastewater treatment and hazardous materials disposal. Therefore, the potential impacts were considered less than significant. No new impacts would be expected from adoption of the potential new or amended control measures. These measures will be analyzed individually for environmental impacts if and when they are proposed for adoption. There are no changes in the project, changes in circumstance, or new information of substantial importance that involve significant new environmental effects or a substantial increase in the severity of previously identified environmental effects.

XVIII. MANDATORY FINDINGS OF SIGNIFICANCE – Since the previous EIR was certified, are there any changes in the project, changes in circumstances under which the project is undertaken and/or "new information of substantial importance" that result in any mandatory finding of significance listed below?

- Does the project degrade the quality of the environment, substantially reduce the habitat of a fish or wildlife species, cause a fish or wildlife population to drop below self-sustaining levels, threaten to eliminate a plant or animal community, reduce the number or restrict the range of a rare or endangered plant or animal or eliminate important examples of the major periods of California history or prehistory?
- Does the project have impacts that are individually limited, but cumulatively considerable? ("Cumulatively considerable" means that the incremental effects of a project are considerable when viewed in connection with the effects of past projects, the effects of other current projects, and the effects of probable future projects)?
- Does the project have environmental effects, which will cause substantial adverse effects on human beings, either directly or indirectly?

Potentially Significant Impact	Less Than Significant with Mitigation Incorporated	Less Than Significant Impact	No Impact
☐	☐	☒	☐

The previous EIR did not identify any impacts which would necessitate mandatory findings of significance. This proposed 2016 RAQS Revision proposes the adoption of more stringent emissions limits using similar control technologies for the same control measures as analyzed in the previous programmatic EIR. Thus, the proposed action will result in further enhancement of the quality of the environment, by further reducing air pollution in San Diego County. This will result in beneficial impacts to human health and the environment. No new impacts would be expected from adoption of the potential new or amended control measures. These measures will be analyzed individually for environmental impacts if and when they are proposed for adoption. There are no changes in the project, changes in circumstance, or new information of substantial importance that involve significant new environmental effects or a substantial increase in the severity of previously identified environmental effects.